

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

STEVEN O. BRYANT (2)

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Criminal Action No. 4:19-cr-832-02

**DEFENDANT STEVEN O. BRYANT’S UNOPPOSED MOTION FOR LEAVE
TO MODIFY CONDITIONS OF RELEASE**

Defendant Steven O. Bryant (“Mr. Bryant”) seeks leave from this Court to modify the terms of his Conditions of Release to allow for limited travel outside the area to which he is currently restricted.

Pursuant to the Court’s Order Setting Conditions of Release (Dkt. 12), Mr. Bryant is presently restricted to travel solely within Harris County and the counties bordering Harris County (“Restricted Area”).

Mr. Bryant’s daughter plays club volleyball, and in the past, Mr. Bryant has traveled with his daughter for her volleyball tournaments. However, several of her upcoming tournaments are expected to take place outside of the Restricted Area. Accordingly, Mr. Bryant respectfully requests that the Court modify his bond conditions to permit him to travel outside of the Restricted Area for the limited purpose of attending his daughter’s volleyball tournaments.

Counsel for Mr. Bryant has consulted with attorneys for the Government and with Mr. Bryant’s probation officer and they are not opposed the proposed modification.

Respectfully submitted,

DRUMHELLER, HOLLINGSWORTH & MONTHY, LLP

/s/ Anthony D. Drumheller

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**ATTORNEYS FOR DEFENDANT
STEVEN O. BRYANT**

CERTIFICATE OF CONFERENCE

I hereby certify that I have communicated with U.S. Attorney's Office and the U.S. Probation Office by email regarding the matters addressed in this Motion, and they are unopposed to the relief sought herein.

/s/ Anthony D. Drumheller

Anthony D. Drumheller

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties.

/s/ Anthony D. Drumheller

Anthony D. Drumheller